

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Proposal to Revise Multichannel Multipoint)	RM-10586
Distribution Service and the Instructional)	
Television Fixed Service Rules)	

To: The Wireless Telecommunications Bureau

COMMENTS OF COUNTERPOINT COMMUNICATIONS, INC.

Counterpoint Communications, Inc. ("Counterpoint") submits these comments in support of the proposal ("Proposal") submitted by the Wireless Communications Association International, the National ITFS Association, and the Catholic Television Network to change the rules governing the Multichannel Multipoint Distribution Service ("MMDS") and the Instructional Television Fixed Service ("ITFS").¹ The revised rules would result in more streamlined licensing for MMDS and ITFS licensees, encourage the deployment of new wireless broadband services, and enhance the availability and usefulness of educational services across the United States.

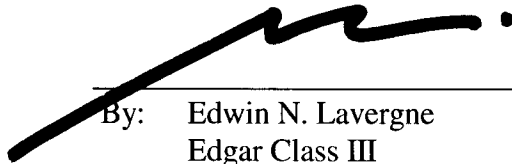
Counterpoint supports the Proposal because it provides a framework to protect existing ITFS operations while, at the same time, opening up the spectrum for a host of new two-way, interactive broadband services. These new services are vitally important, and will further our ability to serve teachers, students and others in the community.

¹ See "Wireless Telecommunications Bureau Seeks Comment on Proposal to Revise Multichannel Multipoint Distribution Service and Instructional Television Fixed Service Rules," *Public Notice*, DA 02-2732 (rel. Oct.17, 2002).

The Proposal was the result of significant work by numerous ITFS and MMDS licensees, engineers, equipment vendors, and others with differing interests and perspectives. Counterpoint urges the Commission to move swiftly to issue a Notice of Proposed Rulemaking in response to the Proposal so that others will have an opportunity to comment and new services can be deployed at the earliest possible time.

Respectfully submitted,

COUNTERPOINT COMMUNICATIONS, INC.



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